

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE**

UNITED STATES OF AMERICA)	
)	
v.)	No. 2:22-CR-30
)	JUDGES WYRICK/ CORKER
JOHNNY SHANE BROWN)	

**MOTION TO CONTINUE MOTION
DEADLINE, PLEA DEADLINE AND TRIAL DATE**

Johnny Shane Brown, by counsel, moves the Court for a continuance of the motion deadline, plea deadline and trial date in this case. In support of this motion, defendant states and shows as follows:

1. The motion deadline is today, and the government's response deadline is December 27, 2022. The plea deadline is January 19, 2023, and the trial is scheduled for February 2, 2023.

2. Mr. Brown's case was recently reassigned to undersigned counsel. Counsel requests additional time to investigate new information and review findings with Mr. Brown. Counsel does not believe she can adequately prepare or effectively represent Mr. Brown within the currently scheduled deadlines and trial dates.

3. The granting of the continuance should result in the delay being excluded under the Speedy Trial Act as the ends of justice are best served by allowing counsel the additional time necessary for effective preparation given counsel's exercise of due diligence, as required under 18 U.S.C. § 3161(h)(7)(A) and (B). Counsel cannot provide the effective assistance of counsel otherwise.

4. Counsel has conferred with AUSA Todd Martin who has no objections to the request for additional time.

5. The request for extension is not being made for the purposes of delay.

In consideration of the foregoing, counsel for the defendant requests a continuance of the motion deadline, plea deadline, and trial date.

RESPECTFULLY SUBMITTED:

FEDERAL DEFENDER SERVICES OF
EASTERN TENNESSEE, INC.

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